

IN THE
**United States District Court for the
District of Maine**

ANDREW U. D. STRAW, <i>Plaintiff,</i>)	Case#: 1:25-cv-00350-JAW-KFW
)	
)	Hon. John A. Woodcock, Jr.
v.)	Judge Presiding
)	Hon. Karen Frink Wolf
STATE OF MAINE)	Magistrate Judge
VOCATIONAL REHABILITATION,)	
<i>Defendant.</i>)	
)	JURY TRIAL NOT DEMANDED

MOTION FOR COURT SERVICE

I, plaintiff ANDREW U. D. STRAW, make the following MOTION to serve defendant:

FACTS

1. The Court has graciously granted my request to proceed *in forma pauperis* on **July 11, 2025**.
2. The Court indicated that it would do a frivolous review under 28 U.S.C. § 1915(e).
3. The facts of this case are relatively simple, that Maine VR ignored my request for services and my emails requesting them for about **7 months** after finding me eligible for services, after communicating properly for over a year but then changing to no communication for 7 months when I asked for help with a new plan, to establish a disability rights law firm serving Maine and the First Circuit.

4. I believe these facts represents a wholesale denial of services (any and all) during that time, I believe in good faith that I have stated a valid claim. This failure to communicate was intentional discrimination because prior to this ignoring for 7 months, VR did communicate with me promptly each time I wrote by email.
5. The change in behavior once I informed VR of my mental illness issues affecting my studies and my plan change was **intentional discrimination**. Being deliberately indifferent to so many emails from me over so many months (7) felt like the agency had stripped my eligibility through its default failure to communicate. This was very distressing for me. Any economic or financial benefit or service with any value was thus impossible for me to obtain during that time. VR is specifically for disabled people to seek work. Withholding services prevents progress toward self-employment and that has real financial, economic value. As VR Maine itself explains on its website, helping disabled people obtain employment is the whole reason VR exists, not to give *its employees* titles and salaries and raises and promotions while not responding to disabled people like me who ask for services. *See:*

The Division of Vocational Rehabilitation, also known as "VR," is a Department of Labor program that helps people who have disabilities to find and keep a job. VR helps people who have physical, mental, or emotional disabilities.

<https://www.maine.gov/rehab/dvr/vr.shtml>

6. Ignoring me for 7 months after a pattern of prompt responses for about a year and my eligibility being granted (Dkt. 1-1) must be deemed deliberate,

intentional discrimination with economic impacts that is directly contrary to the purpose of that agency even existing.

<https://www.courtlistener.com/docket/70742846/1/1/straw-v-state-of-maine-vocational-rehabilitation/>

7. No agency can provide any service while ignoring those who communicate and seek those services. *See*:

To state a claim for compensatory damages, the plaintiffs must clear two hurdles. First, private individuals may recover **compensatory damages** under § 504 and **Title II** only for intentional discrimination. See *Alexander v. Sandoval*, 532 U.S. 275, 280-81, 121 S. Ct. 1511, 149 L. Ed. 2d 517 (2001).²⁰ Here, the plaintiffs clear this hurdle because the complaint, with all reasonable inferences drawn in its favor, alleges intentional discrimination.

Nieves-Márquez v. Puerto Rico, 353 F.3d 108 (1st Cir. 2003)

<https://law.justia.com/cases/federal/appellate-courts/F3/353/108/577117/>

8. I also have asked the State of Maine to waive service of summons and COMPLAINT in an email I sent to Attorney.General@maine.gov on **July 9, 2025**, with no response from the Attorney General for 26 days. I attach as **Exhibit 1** an email delivery notice dated **July 10, 2025**, in the morning Manila Time but evening on **July 9, 2025**, EST.
9. This is kind of the same problem. I email the State of Maine and it ignores me.
10. Instead of Maine waiving service after notice of the lawsuit, it stays silent and thus prompts me to ask the Court to provide its service. It costs virtually nothing for Maine to respond with a signature and contact information on the waiver form.

11. Because I believe my “**deliberate indifference**” (which under the facts here means **intentional discrimination** depriving me of real economic value) cause of action matches facts that I have presented to the Court, and with no indication of any waiver forthcoming, I ask the Court for service of summons and COMPLAINT (**Dkt. 1**) to the defendant at the following addresses:

12. Maine Governor Janet Mills
1 State House Station
Augusta, ME 04333
207-287-3531

13. Maine Attorney General Aaron Frey
6 State House Station
Augusta, ME 04333
207-626-8800

WHEREFORE, I so MOVE for service under FRCP 4(c)(3) and 28 U.S.C. § 1915(d).

I, Andrew U. D. Straw, verify that the above factual contentions and statements are true and correct to the best of my knowledge, information, and belief, on penalty of perjury. Signed: **August 4, 2025**.

Respectfully,

A handwritten signature in black ink that reads "Andrew U. D. Straw". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

s/ ANDREW U. D. STRAW
9169 W. State ST, STE 690
Garden City, ID 83714-1733
Mobile Phone: (847) 807-5237
andrew@andrewstraw.com

CERTIFICATE OF SERVICE

I, Andrew U. D. Straw, certify that on **August 4, 2025**, I sent this **MOTION and 1 EXHIBIT** via email to the Clerk of Court. Counsel for Defendant is the Attorney General of Maine, Aaron Frey. The email sent to the Clerk of Court is copied to the Attorney General's email address since that officer has not yet agreed to waive service and I was waiting for response: Attorney.General@maine.gov

Respectfully submitted,

A handwritten signature in black ink, reading "Andrew U. D. Straw", is written over a horizontal line.

s/ ANDREW U. D. STRAW
Pro Se Plaintiff
9169 W. State ST, STE 690
Garden City, ID 83714-1733
Mobile Phone: (847) 807-5237
andrew@andrewstraw.com

EXHIBIT LIST

- **Exhibit 1:** Email Delivery Notice, July 10, 2025 (Manila Time, morning)